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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JACQUELINE ALVAREZ, on behalf of the
State of California, as a private attorney
general,

Plaintiff,

vs.

GOLDEN STATE WATER COMPANY, a
California corporation; and Does 1 through 50,
inclusive,

Defendants.

Case No. 22PSCV00242

**DECLARATION OF JACQUELINE
ALVAREZ IN SUPPORT OF MOTION
TO APPROVE PAGA SETTLEMENT**

Hearing Date: May 21, 2024

Hearing Time: 8:30 a.m.

Reservation ID: 389553526197

Judge: Hon. Lynette Gridiron Winston
Dept.: 6

Action Filed: March 15, 2022

Trial Date: Not Set

1 I, Jacqueline Alvarez, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I
3 am making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion to
4 Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendant Golden State Water
6 Company (“Defendant”) from March of 2020 to June of 2021.

7 3. I retained my attorneys who are experienced in PAGA representative action litigation
8 and claims against employers for violations of the California Labor Code. I have no personal
9 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any
10 actual or potential conflicts of interest with another PAGA Member in this case nor am I aware of
11 having any actual or potential conflicts of interest with ILYM Group Inc., the settlement administrator.

12 4. I was subject to Defendant’s policies and practices that have been alleged as unlawful in
13 the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For
14 example, I spent time working off the clock in order to meet performance metrics as a result of
15 pressures from call center work. Specifically, in order to keep up with an inundation of customer calls,
16 I was required to be on call and ready to respond to customer calls at all hours including during breaks
17 and after hours. Defendant also failed to provide me with full relief of all duties for rest periods and
18 also failed to provide me with compliant rest breaks by mandating that supervisors are to advise the
19 employees when they can take breaks instead of the employees having the freedom to choose when to
20 take a rest break. With respect to meal breaks, they were often late, missed or short and when these
21 violations occurred I did not receive all the meal break premium payments I should have received.

22
23 5. In bringing this case for myself, the State of California, and the other employees, I
24 understood a lot of work would be required and I was willing to, and did, do the work to keep the case
25 moving forward. For instance, before the complaint was filed I spoke to my attorneys several times and
26 discussed how Defendant implemented its company policies and procedures. I also assisted my attorneys
27 in their investigation into my claims by providing them documents and answering their questions. I
28

1 reviewed the complaint before it was filed and after it was filed I was given access to an electronic file
2 sharing program that alerted me via email when important documents were filed so that I could review
3 them and keep up with the developments in the case. I was informed that the Defendant had the right to
4 take my deposition, and that the preparation and deposition itself could take multiple days. Although my
5 deposition was not taken, I feel I would have been adequately prepared and comfortable to give testimony
6 on my experiences.

7
8 6. My attorneys explained to me the risks and benefits of bringing a representative action.
9 I understood that I took on the risk, both professionally and financially, in pursuing the case as a
10 representative PAGA action.

11
12 7. A mediation took place on June 16, 2023 with Hon. Daniel Buckley (Ret.), a former judge
13 and a well-respected and experienced mediator. The mediation resulted in an agreement to settle the
14 action. I communicated with my attorneys regarding the terms of the settlement which was reached
15 between the parties and understood that the recovery in this case was for the benefit of my fellow
16 coworkers, not just for me, and therefore wanted the best possible result to be obtained for the PAGA
17 Members.

18
19 8. I have been actively involved with this lawsuit. Although I did not keep time records, I
20 was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time
21 on the issues presented during the lawsuit and in the settlement process. I estimate that I spent
22 approximately 30-40 hours working on this case up until this point.

23
24 9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and reasonable
25 given the facts of the case.

26 10. As part of the settlement it was necessary for me to sign a general release of claims I
27 may have against the Defendant. I believe the Service Award I have requested provides me with some
28 compensation for this agreed release and is also fair compensation for the service I performed and

1 the risks I undertook.

2
3 Executed on Mar 29, 2024, at Montclair, CA.
4 (city, state)

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6 _____
7 Jacqueline Alvarez (Mar 29, 2024 13:03 PDT)
8 _____
9 Jacqueline Alvarez